

Before the  
Copyright Royalty Judges  
Washington, D.C.

In the Matter of	)	
	)	
Distribution of 2015	)	Docket No. 17-CRB-0011-SD
Satellite Royalty Funds	)	(2015)
	)	

**DECLARATION OF RAUL GALAZ IN SUPPORT OF  
MULTIGROUP CLAIMANTS' SURREPLY ADDRESSING  
PROPOSED PARTIAL DISTRIBUTION OF 2015 SATELLITE  
FUNDS TO CERTAIN "ALLOCATION PHASE CLAIMANTS"**

I, Raul Galaz, declare as follows:

1. I am over 18 years of age, am a consultant for Multigroup Claimants in the above referenced proceeding and am personally familiar with the facts stated herein and, if called upon could competently testify thereto.
2. To the best of my knowledge, only three of the thirty-three (33) listed entities now identified as part of the "Devotional Claimants" in the above proceeding have ever participated in a prior settlement for the distribution of satellite royalties. The most recent of those settlements related to calendar years 1997-1998, and were settlements entered into with Worldwide Subsidy Group, LLC almost two decades ago.

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3. Specifically, Worldwide Subsidy Group, LLC dba Independent Producers Group negotiated a comprehensive settlement of 1997 and 1998 satellite royalties with only three of the claimants currently aligning themselves with the Devotional Claimants – Christian Broadcasting Corporation, In Touch Ministries, and Crystal Cathedral Ministries.

4. An analysis of the 2008 satellite claims for the Settling Devotional Claimants (“SDC”) reveals fifteen entities on whose behalf the SDC made 2008 satellite claims, eleven of which appear in the current list of “Devotional Claimants” in this proceeding.

5. Worldwide Subsidy Group, LLC also entered into a comprehensive settlement agreement with the MPAA-represented Program Suppliers for 1997-1999 satellite royalties attributable to the Program Suppliers category. The validity of the settlement agreement was a matter of significant contention because it was entered into between a putative representative of WSG after the controlling member of WSG had informed the MPAA that such individual had no authority to act on behalf of WSG.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: November 7, 2017

\_\_\_\_\_/s/\_\_\_\_\_  
Raul Galaz

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MULTIGROUP CLAIMANTS' SURREPLY**

# Certificate of Service

I hereby certify that on Thursday, November 09, 2017 I provided a true and correct copy of the Declaration to the following:

Broadcaster Claimants Group, represented by Ann Mace served via Electronic Service at amace@crowell.com

Powell, David, represented by david powell served via Electronic Service at davidpowell008@yahoo.com

SESAC, Inc., represented by John C. Beiter served via Electronic Service at jbeiter@lsglegal.com

Program Suppliers, represented by Alesha M Dominique served via Electronic Service at amd@msk.com

Joint Sports Claimants, represented by Robert A Garrett served via Electronic Service at robert.garrett@apks.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis served via Electronic Service at smosenkis@ascap.com

Broadcast Music, Inc. (BMI), represented by Jennifer T. Criss served via Electronic Service at jennifer.criss@dbr.com

Devotional Claimants, represented by Jessica T Nyman served via Electronic Service at jessica.nyman@pillsburylaw.com

Signed: /s/ Brian D Boydston